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**From:** Hanson, Robyn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C4CD36EF688F47ABA2373A33B5D9B8FF-HANSON, ROB]  
**Sent:** 4/12/2021 4:23:06 PM  
**To:** Cathy Laughner [cathyl@bkbh.com]  
**CC:** Thomas Jodoin [TJODOIN@helenamt.gov]  
**Subject:** RE: City of Helena - Sampling and Analysis Plan

Cathy,

I will further review your statement on the sampling and analysis plan correspondence with Emilio and Al and do not write in response to that now.

Looking at my current calendar, I can be available after 1pm today for a call. What time would you like to schedule?

Robyn

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**From:** Cathy Laughner <cathyl@bkbh.com>  
**Sent:** Friday, April 9, 2021 4:16 PM  
**To:** Hanson, Robyn <Hanson.Robyn@epa.gov>  
**Cc:** Thomas Jodoin <TJODOIN@helenamt.gov>  
**Subject:** City of Helena - Sampling and Analysis Plan

Robyn,

The City and EPA communicated on the sampling and analysis plan issues in August 2020 as shown in the below email chain. Matt Culpo's final submission was on August 31, 2020 with nothing back from EPA so we believe that the proposed order/corrective action for sampling procedures is complete.

Regarding your 4/6 email, I would like to give you a call Monday.

Cathy Laughner

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**From:** Matthew Culpo  
**Sent:** Monday, August 31, 2020 3:38 PM  
**To:** Llamozas, Emilio <Llamozas.Emilio@epa.gov>; Garcia, Al <garcia.al@epa.gov>; Hanson, Robyn <Hanson.Robyn@epa.gov>  
**Cc:** Mark Fitzwater <mfitzwater@helenamt.gov>; Phil Hauck <PHAUCK@helenamt.gov>; Thomas Jodoin <TJODOIN@helenamt.gov>  
**Subject:** RE: City of Helena Pretreatment Program - Sampling and Analysis Plan

Emilio,

Thank you for your comments and suggestions, I believe they improve the Sampling and Analysis Plan and have addressed them in attached documents as described below.

- Alpine Labs Chain of Custody: this is a copy of the COC form from Alpine Labs which is used by the Pre-Treatment Program.
- Sampling and Analysis Plan comments and response tracking: this is a copy of the SAP which shows the tracking of comments by EPA and the responses by the City of Helena, in addition to, changes to the body of the document made by EPA and COH.
- Final Sampling and Analysis Plan 8-31-2020: this is the final version of the SAP addressing EPA's comments among other revisions for consistency with the Pre-treatment Program.

Please let me know if there are any other required changes needed that do not meet the regulations.

Thank you,  
Matt Culpo, P.E.  
Civil Engineer  
City of Helena  
316 North Park Avenue  
City-County Building, Room 413  
Ph: 406-447-8073  
Cell: 406-422-6147  
[mculpo@helenamt.gov](mailto:mculpo@helenamt.gov)

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**From:** Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>

**Sent:** Tuesday, August 18, 2020 10:58 AM

**To:** Matthew Culpo <[MCULPO@helenamt.gov](mailto:MCULPO@helenamt.gov)>; Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>; Hanson, Robyn <[Hanson.Robyn@epa.gov](mailto:Hanson.Robyn@epa.gov)>

**Cc:** Mark Fitzwater <[mfitzwater@helenamt.gov](mailto:mfitzwater@helenamt.gov)>; Phil Hauck <[PHAUCK@helenamt.gov](mailto:PHAUCK@helenamt.gov)>; Thomas Jodoin <[TJODOIN@helenamt.gov](mailto:TJODOIN@helenamt.gov)>

**Subject:** RE: City of Helena Pretreatment Program - Sampling and Analysis Plan

Hi Matt,

Thanks for sending the City's deliverable for item number 6 regarding the Sampling and Analysis Plan. Below are EPA's comments on the Sampling and Analysis Plan. These comments are also included in the attached document.

- 1- Section 1.1.1 of the Sampling and Analysis Plan has the sampling locations for current industrial users. This section should include the photos for sampling locations for each industrial user.
- 2- Section 2.1.1 of the Sampling and Analysis Plan has the Pollutants Monitored by Current Industrial Users. It is recommend that chain-of-custody templates for each SIU sampling event be referenced in this section and included as attachments to the Sampling and Analysis Plan.
- 3- Section 4.1.1 of the Sampling and Analysis Plan has the monitoring frequency for the SIU self-monitoring, but not for the POTW sampling of the SIU. This section should be revised to indicate that the POTW will sample the SIUs once per year. It should also indicate when the TTO sampling will occur for DIP during the permit cycle.
- 4- Section 5.1 of the Sampling and Analysis Plan has the Analytical Methods section. This section should address:
  - Holding times for each parameter sampled at each SIU.
  - Chemical or temperature preservation for each parameter sampled at each SIU.
  - Analytical techniques for each parameter sampled at each SIU.
- 5- The sampling plan should also address the creation and maintenance of required records, as listed in 40 C.F.R. § 403.12(o). See the excerpted requirements below:

*Record-keeping requirements.* (1) Any Industrial User and POTW subject to the reporting requirements established in this section shall maintain records of all information resulting from any monitoring activities required by this section, including documentation associated with Best Management Practices. Such records shall include for all samples:

- (i) The date, exact place, method, and time of sampling and the names of the person or persons taking the samples;
- (ii) The dates analyses were performed;
- (iii) Who performed the analyses;
- (iv) The analytical techniques/methods use; and
- (v) The results of such analyses.

(2) Any Industrial User or POTW subject to the reporting requirements established in this section (including documentation associated with Best Management Practices) shall be required to retain

for a minimum of 3 years any records of monitoring activities and results (whether or not such monitoring activities are required by this section) and shall make such records available for inspection and copying by the Director and the Regional Administrator (and POTW in the case of an Industrial User). This period of retention shall be extended during the course of any unresolved litigation regarding the Industrial User or POTW or when requested by the Director or the Regional Administrator.

(3) Any POTW to which reports are submitted by an Industrial User pursuant to paragraphs (b), (d), (e), and (h) of this section shall retain such reports for a minimum of 3 years and shall make such reports available for inspection and copying by the Director and the Regional Administrator. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the Industrial User or the operation of the POTW Pretreatment Program or when requested by the Director or the Regional Administrator.

6- Section 5.2 of the Sampling and Analysis Plan addresses pH meter calibrations. This section should reference pH calibration log sheets and include them as an attachment to the plan. Also, the pH meter should be calibrated on the day of the sampling, prior to collecting the sample.

Please let me know if you have any questions.

Thanks,

Emilio Llamozas

(303) 312-6407 phone

To report an environmental violation, please visit EPA's website at

<http://www.epa.gov/compliance/complaints/index.html>

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**From:** Matthew Culpo <[MCULPO@helenamt.gov](mailto:MCULPO@helenamt.gov)>

**Sent:** Monday, August 3, 2020 10:24 AM

**To:** Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>; Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>; Hanson, Robyn <[Hanson.Robyn@epa.gov](mailto:Hanson.Robyn@epa.gov)>

**Cc:** Mark Fitzwater <[mfitzwater@helenamt.gov](mailto:mfitzwater@helenamt.gov)>; Phil Hauck <[PHAUCK@helenamt.gov](mailto:PHAUCK@helenamt.gov)>; Thomas Jodoin <[TJODOIN@helenamt.gov](mailto:TJODOIN@helenamt.gov)>

**Subject:** City of Helena Pretreatment Program - Sampling and Analysis Plan

Al,

This email and attachment are intended to respond to deliverables No. 6 in the list provided below by EPA. Attached, please find the updated Sampling and Analysis Plan with provisions for time-proportional sampling and pH meter calibration.

Please let me know if you have any comments or suggestions related our update Sampling and Analysis Plan, or if it satisfies the requirements and can be approved.

Thank you,

Matt Culpo, P.E.

Civil Engineer

City of Helena

316 North Park Avenue

City-County Building, Room 413

Ph: 406-447-8073

Cell: 406-422-6147

[mculpo@helenamt.gov](mailto:mculpo@helenamt.gov)